

# Fact Sheet



## For Final Significant Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Significant Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on October 19, 2006.

Permit Number: **R30-04100011-2006**  
Application Received: **April 13, 2010**  
Plant Identification Number: **03-54-04100011**  
Permittee: **Dominion Transmission, Inc**  
Facility Name: **Kennedy Compressor Station**  
Mailing Address: **445 West Main Street**  
**Clarksburg, WV 26301**

Permit Action Number: *SM01*      Revised: *February 14, 2011*

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Physical Location:	Valley Chapel, Lewis County, West Virginia
UTM Coordinates:	543.59 km Easting • 4328.71 km Northing • Zone 17
Directions:	Interstate 79 North to the Jane Lew Exit (Number 105). Turn right on County Route 7 and go 0.8 miles to Jane Lew, intersection of U.S. Route 19. Turn left on U.S. Route 19 and travel 4.7 miles to County Route 12, the Jackson's Mill Road. Turn right on County Route 12 and travel 2.4 miles, bear left and cross a narrow bridge to Jackson's Mill State 4-H Camp, County Route 12 changes to County Route 10 at this point, proceed 0.6 miles to the intersection of County Route 1, turn left and go approximately 200 yards to Valley Chapel Road, County Route 10. Turn right and go approximately 1.3 miles, turn left and cross a wooden plank bridge to the site.

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## Facility Description

Kennedy Compressor Station is a natural gas transmission facility covered by Standard Industrial Classification (SIC) Code 4922. The station has the potential to operate seven (7) days per week, twenty-four (24) hours per day. The station consists of two (2) 1100 HP natural gas fired reciprocating engines, one (1) dehydrator reboiler, one (1) dehydration unit, one (1) dehydration unit still flare and eight (8) storage tanks of various sizes.

This modification involves permitting the existing flare (F1) as a control device with 95% destruction efficiency and incorporating construction permit R13-2837.

## Emissions Summary

Based on recent gas sampling event permittee has estimated that uncontrolled VOC emissions from the dehy would be 420.68 tons per year (tpy). This modification will reduce the controlled VOC emissions to 21.03 tpy (with the federally enforceable flare); therefore this application represents a decrease of 399.7 tons per year of VOC.

## Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 445.884 tons per year of NO<sub>x</sub> and 150.94 tons per year of CO. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Dominion Transmission, Inc is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

## Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR13	
	45CSR30	Operating permit requirement.
	40 C.F.R. § 63.11	Control Device General Provisions
	40 C.F.R. 63 Subpart HH	NESHAP Natural Gas Production Facility
	45CSR6	Control of air pollution from Incinerators
State Only:	45CSR42	Greenhouse Gas Emissions Inventory Program

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

## Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
R13-2837	August 16, 2010	N/A

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

## Determinations and Justifications

The following changes have been made to the existing Title V permit:

1. In section 1.1 "DEHY" has been changed to "F1" and "DEHY01" has been changed to "DEHY" to correspond to R13-2837. Emission Point ID DEHY01 is eliminated because DEHY emissions are routed to the federally enforceable flare.
2. Section 1.2 has been added to show the new R13-2837.
3. Section 2.1.4 has been added to define "rolling yearly total".
4. Sections 3.1.1 and 3.1.2 have been changed due to changes in 45CSR6.
5. The citation in section 3.1.3 has been changed due to the repeal of 45CSR15 and now 40 C.F.R. 61 is incorporated in 45CSR34.
6. Equipment citation DEHY01 is taken out for 3.1.9 and 3.1.10 – the reasoning is explained in Section 1 above.
7. Sections 3.1.12 and 3.5.10 have been added due to new rule 45CSR42 for greenhouse gas emissions.
8. Old section 3.2.2 requiring monthly visible emission checks is being moved to Section 5.3.1.
9. Old sections 3.2.3 – 3.2.5 are being renumbered 3.2.2 – 3.2.4.
10. Equipment citation DEHY01 is taken out for 3.2.3 and 3.2.4 – the reasoning is explained in Section 1 above.
11. 45CSR13, R13-2837 is added to Section 3.4.1 citation.
12. Sections 3.5.3 and 3.5.5 are changed to include electronic report submittal to EPA.
13. Section 5.0 heading is changed - "DEHY" has been changed to "F1" and DEHY01 is eliminated because DEHY emissions are routed to the federally enforceable flare. Citations to DEHY and DEHY01 have been eliminated in Section 5.0 because all of section 5.0 are applicable requirements for the flare.

14. For F1 – meeting the PM limit of 0.03 lb/hr specified in section 5.1.6 shall show compliance with 45CSR6 limit of 1.18 lb/hr in Section 5.1.1.

15. Section 5.1.2 has been changed to match the language in R13-2837 which combines 45CSR§6-4.3 & 45CSR§6-4.4 requirements.

16. 45CSR13, R13-2837 is added to Section 5.1.4 citation.

17. Old sections 5.1.5, 5.2.1, 5.3.1 and 5.5.2 requiring wet gas samples and analysis of dehy emissions to show that the facility is a minor source of HAPs is eliminated because R13-2837 makes the flare (which controls emissions from dehy) federally enforceable and complying with new section 5.1.6 assures that the flare emissions (and hence the facility) is not a major source of HAPs.

18. New sections 5.1.5 through 5.1.9 have been added to reflect R13-2837 conditions.

19. Section 5.1.6 (corresponding to Section 4.1.2 of R13-2837) imposes pollutant limits. R13-2837 does not have any way of showing compliance with these limits nor did the R13-2837 Engineering Evaluation explain how those limits were calculated or how the permittee shall comply with those limits. After questioning the Rule 13 permit writer, the explanation for this is as follows:

The non VOC criteria emissions are all based on AP-42 and the maximum design capacity of the flare. For the VOC/HAPs, uncontrolled emissions are based on the maximum throughput, Glycalc and their most recent sampling. Permitted emissions are then based on uncontrolled emissions with 95% destruction efficiency from the flare (condition 5.1.7.).

Showing compliance with maximum throughput in section 5.1.5 (utilizing condition 5.4.5) and assuring 95% destruction efficiency from the flare substantiated by conditions 5.1.7, 5.1.8, 5.3.2, 5.4.4 and 5.4.6 shall show compliance with non VOC criteria pollutants and VOC/HAPs emissions limits in Section 5.1.6.

20. The permittee stated in their application that the facility is subject to the area source portion of 40 C.F.R. 63 Subpart HH, however permittee is claiming the less than 1 ton/yr benzene exemption under 40 C.F.R. §63.764(e). Conditions 5.1.10, 5.3.4 & 5.4.9 have been added for permittee to claim the benzene exemption.

21. New sections 5.3.1 through 5.3.3 have been added to reflect R13-2837 conditions.

22. New sections 5.4.2 through 5.4.8 have been added to reflect R13-2837 conditions.

23. Old section 5.5.1 has been revised to incorporate R13-2837 condition.

24. New sections 5.5.2 and 5.5.3 have been added to reflect R13-2837 conditions.

25. In Section 1.1, Emission Units table flare design capacity is changed to 3 mmbtu/hr from 64 cf/min (which was the old pilot fuel rate).

26. In Section 5.1.1 calculations for PM emissions from flare is changed to reflect flare's new design capacity.

## **Non-Applicability Determinations**

The following requirements have been determined not to be applicable to the subject facility due to the following:

40 CFR 64 (CAM Rule) – This is a Title V permit significant modification. According to 40 C.F.R § 64.5(a) and (b), 40 CFR 64 (CAM Rule) has to be addressed only if there is a large PSEU (Emission Unit with potential to emit emissions at major source threshold after controls) at this facility. There is no large PSEU at this facility after permitting the federally enforceable flare [Note: After flare the maximum yearly emission is 21.03 tons of VOC (largest emission of all criteria pollutants) and yearly HAP emissions are less than 10 tons for individual HAPs and less than 25 tons of total HAPs.]

## **Request for Variances or Alternatives**

None

## **Insignificant Activities**

Insignificant emission unit(s) and activities are identified in the Title V application.

## **Comment Period**

Beginning Date: August 25, 2010  
Ending Date: September 24, 2010

All written comments should be addressed to the following individual and office:

U.K.Bachhawat  
Title V Permit Writer  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304

## **Procedure for Requesting Public Hearing**

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

## **Point of Contact**

U.K.Bachhawat  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1256 • Fax: 304/926-0478

### **Response to Comments (Statement of Basis)**

Comment: EPA had the following comment: EPA questioned the Major/Area Source status of the facility. EPA stated that based on 40CFR63.760(a)(1), once an area source becomes major, it can't go back to being an area source. 40CFR63.760(a)(1) states, "A facility that is determined to be an area source, but subsequently increases its emissions or its potential to emit above the major source levels (without first obtaining and complying with other limitations that keep its potential to emit HAP below major source levels), and becomes a major source, must comply thereafter with all provisions of this subpart applicable to a major source starting on the applicable compliance." date specified in paragraph (f) of this section.

Response to comment: After further discussion with EPA, decision has been made to move forward with issuing the permit.